REMARKS

In response to the above-identified Office Action, no claims have been added, no claims have been cancelled, and no claims have been amended. Accordingly, Claims 1-22 are pending.

I.   Double Patenting Rejection

The Examiner has rejected Claims 1 and 12 under the judicially created doctrine of obviousness type double patenting as being unpatentable over Claims 1, 7, 12, 18, 23, 29, 34 and 40 of U.S. Patent No. 6,633,963 ("the '963 patent"). Applicants respectfully traverse this rejection.

The Examiner has taken the position that the only difference between Claim 1 and the cited claims from the '963 patent is that Claim 1 includes an output device. The Examiner asserts that there is no difference between Claim 12 and those claims. Applicants respectfully submits that none of the to claims of the '963 patent include a system memory including "an isolated area, an isolated output area and a non-isolated area" as claimed. The notion of a separate isolated output area of the system memory is neither taught nor suggested by the claims of the '963 patent. Thus, Claim 1 is not rendered obvious in view of those claims and is patentably distinct.

With respect to Claim 12, Applicants respectfully submit that the notion of preventing access to output data, (e.g., data output to a display) from a requester that is not operating in an isolated mode, (e.g., the requester must be operating in the isolated mode to have access) is patentably distinct from the claims of the '963 patent. Those claims do not address access to output data and therefore do not teach or suggest preventing access to output data as claimed.

In view of the foregoing, it is respectfully requested that the rejection under the judicially created doctrine of obviousness type double patenting be withdrawn.

II. Claims Rejected Under 35 U.S.C. §102

The Examiner has rejected Claims 1-17 under 35 U.S.C. §102 as being anticipated by Pai, U.S. Patent No. 5,935,247 ("Pai"). Applicants respectfully traverse this rejection.

Applicants respectfully submit that all claims currently pending include the limitation of two execution modes, a normal execution mode and an isolated execution mode. Applicants respectfully submit that Pai fails to teach an isolated execution mode. At most, Pai teaches a procedure which permits access to a genetic coding. Access that is denied to all other processes in the system. This procedure does not constitute a mode of operation as claimed. There is no notion of normal and isolated execution modes in which different software may execute depending on the security level desired.

Applicants further submit that the notion of an isolated area, an isolated output area and a non-isolated area in system memory as claimed in independent Claim 1 is absent from the reference. The Examiner's characterization of the monitor as the isolated output area ignores the semantic meaning of the claim, which requires the system memory include the "isolated output area." Since the system memory does not include the monitor, the Examiner's application of Pai to Claim 1 is in error.

With respect to Claim 12, the Examiner passes off the discussion of Claim 12 with merely that it is rejected on the same basis of Claim 1. However, Claim 12 includes a different limitation than Claim 1 and therefore, it is requested that the Examiner explicitly identify where in the reference the elements of Claim 12 can be found. Applicants have reviewed the reference and have not found these elements. It is noted that not only is there no isolated execution mode as claimed, but Applicants have also been unable to identify a teaching of preventing access to output data by any requester not operating in an isolated mode (thus begging the question of whether an isolated mode exists). It is noted that to prevent output data access by a requester not operating in an isolated mode, there must be a notion of a requester that operates in an

isolated mode. The Examiner has not identified and Applicants have been unable to find such a teaching.

In view of the fact that the independent claims are not anticipated by the Pai reference, the dependent claims are similarly not anticipated. Accordingly, it is respectfully requested that the rejection of Claims 1-17 under 35 U.S.C. §102 be withdrawn.

III. Claims Rejected Under 35 U.S.C. §103

The Examiner has rejected Claims 18 through 22 under 35 U.S.C. §103 as rendered obvious by Pai. Applicants respectfully traverse these rejections. As an initial matter with respect to Claim 18, since Pai fails to anticipate or render obvious the independent, Claim 18, is neither anticipated nor rendered obvious. Moreover, as the Examiner acknowledges, Pai does not teach occluding the image prior to the platform transitioning out of an isolated execution mode. The Examiner's assertion that this occlusion would be obvious is premised on hindsight, which is not supported by the reference, but rather can only be derived from Applicant's own specification.

With respect to Claim 19, Applicants respectfully submit that at a minimum, Pai fails to teach or suggest access to an isolated output area (of a memory). As noted above, the Examiner's application of the Pai reference to "an isolated output area" is fatally flawed. Thus, since at least this element is neither taught nor suggested by the Pai reference, Claim 19 and its dependent claims are patentable over that reference and is respectfully requested that the rejection of Claims 18 through 22 under 35 U.S.C. §103 be withdrawn.

CONCLUSION

In view of the foregoing, it is believed that all claims now pending are now in condition for allowance and such action is earnestly solicited at the earliest possible date. If there are any additional fees due in connection with the filing of this response, please charge those fees to our

Deposit Account No. 02-2666. Questions regarding this matter should be directed to the undersigned at (310) 207-3800.

Respectfully submitted,

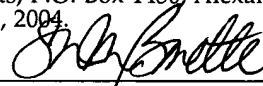BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN

Dated: July 6, 2004

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